

UNITED STATES DISTRICT COURT

FILED

for the
Eastern District of Tennessee

DEC 07 2020

Clerk, U. S. District Court
Eastern District of Tennessee
At KnoxvilleIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Case No. 3:20-MJ-2170

Information Associated with "Bodavis1985" that is
Stored at Premises Controlled by SnapChat, Inc.

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Information associated with "Bodavis1985" that is stored at premises controlled by SnapChat, Inc.

Please see Attachment A, which is attached hereto and fully incorporated herein.

located in the Eastern District of Tennessee, there is now concealed (identify the person or describe the property to be seized):

Please see Attachment B which is attached hereto and fully incorporated herein.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 2252A(a)(5)(B)	Activities Relating to Material Containing Child Pornography

The application is based on these facts:

Please see the Affidavit of Federal Bureau of Investigation Special Agent Paul A. Durant which is attached hereto and incorporated herein.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Paul A. Durant, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 7-21-2020



Judge's signature

City and state: Knoxville, Tennessee

H. Bruce Guyton, United States Magistrate Judge

Printed name and title

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the accounts “Bodavis1985” that is stored at premises owned, maintained, controlled, or operated by Snapchat Inc., a company located at 64 Market Street Venice, CA

ATTACHMENT B

Particular Things to be Seized

For the time period of 01/01/2019-07/31/2020

I. Information to be disclosed by Snapchat

To the extent that the information described in Attachment A is within the possession, custody, or control of Snapchat, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Snapchat, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Snapchat is required to disclose the following information to the government, in unencrypted form whenever available, for each account or identifier listed in Attachment A:

1. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers, email addresses (including primary, alternate, rescue, and notification email addresses, and verification information for each email address), the date on which the account was created, the length of service, the IP address used to register the account, account status, associated devices, methods of connecting, and means and source of payment (including any credit or bank account numbers);
2. All records or other information regarding the devices associated with, or used in connection with, the account or any devices used to access Snapchat services, including serial numbers, Unique Device Identifiers (“UDID”), Advertising Identifiers (“IDFA”), Global Unique Identifiers (“GUID”), Media Access Control (“MAC”) addresses, Integrated Circuit Card ID numbers (“ICCID”), Electronic Serial Numbers (“ESN”), Mobile Electronic Identity Numbers (“MEIN”), Mobile Equipment Identifiers (“MEID”), Mobile Identification Numbers (“MIN”), Subscriber Identity Modules (“SIM”), Mobile Subscriber Integrated Services Digital Network Numbers (“MSISDN”), International Mobile Subscriber Identities (“IMSI”), and International Mobile Station Equipment Identities (“IMEI”);
3. The contents of all messages associated with the account from 01/01/2019 - 07/31/2020 including stored or preserved copies of messages sent to and from the account (including all draft and deleted messages), the source and destination account of each message, the date and time at which each message was sent, the size and length of each message, the actual IP addresses of the sender and the recipient of each message, and the media, if any, attached to each instant message;
4. All activity, connection, and transactional logs for the account with associated IP addresses
5. All records and information regarding locations where the account or devices associated with the account were accessed
6. All records pertaining to the types of service used;
7. All records pertaining to communications between Snapchat and any person regarding the account, including contacts with support services and records of actions taken; and
8. All files, keys, or other information necessary to decrypt any data produced in an encrypted form.

II. Information to be seized by the government

All information described above in Section I that constitutes contraband, fruits, evidence and/or instrumentalities of violations of Title 18 U.S.C. §§ 2252A(a)(5)(B) involving DAVIS since 01/01/2019 including, for each account listed on Attachment A, information pertaining to the following matters:

- a. The identity of the person(s) who created or used the Snapchat id, including records that help reveal the whereabouts of such person(s);
- b. Photographs, images and video, including but not limited to, sexually explicit photographs of minors.
- c. Files depicting sexual conduct involving minors or persons who appear to be minors.
- d. Evidence indicating how and when the account was accessed or used, to determine the chronological and geographic context of account access, use and events relating to the crime under investigation and the account subscriber;
- e. Records of communication (as might be found, for example, in digital data files) between individuals concerning the topic of child pornography, the existence of sites on the Internet that contain child pornography or who cater to those with an interest in child pornography, as well as evidence of membership in online clubs, groups, services, or other Internet sites that provide or make accessible child pornography to its members and constituents.
- f. Evidence indicating the subscriber's state of mind as it relates to the crime under investigation; and
- g. Evidence that may identify any co-conspirators or aiders and abettors, including records that help reveal their whereabouts.

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.